

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ARESTY INTERNATIONAL LAW
OFFICES, P.C.,
Plaintiff,

V.

HARTFORD FIRE INSURANCE
COMPANY,
Defendant.

DOCKET NO: 04-12532 RWZ

DEFENDANT'S AUTOMATIC DISCLOSURES

Now comes the defendant, Hartford Fire Insurance Company, and, pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure makes the following initial disclosures without prejudice to the assertion of any defenses to discovery based upon the attorney/client privilege or work product doctrine or other bases for non-disclosure:

I. Individuals likely to have discoverable information

1. Jeffrey Aresty (principal of Aresty International)
2. Andrew Breines (former Aresty partner)
3. Michelle Sadon (former summer intern)
4. Larry Berman (insured's public adjuster)
5. John Perry (Hartford claims adjuster)
6. Floyd Draper (Hartford claims adjuster).

II. Identification of Documents

1. Hartford Fire Insurance policy.
2. Hartford claim file concerning Aresty property loss.

3. E-mails and letters exchanged between Hartford and representatives of Aresty concerning investigation and adjustment of Aresty property loss.
4. Reports and analysis of Carey & Associates concerning Aresty property loss.
5. Bills, invoices and other documents prepared or produced by Aresty in support of claimed loss.
6. Those documents listed in Plaintiff's Initial Disclosures.

III. Computation of Damages

See Plaintiff's Initial Disclosures.

Respectfully submitted,
The defendant,
Hartford Fire Insurance Company,
By its attorneys,

/s/ Michael F. Aylward

Michael F. Aylward, BBO #024850
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Dated: April 1, 2005

I hereby certify that this document has been served upon all counsel of record in compliance with the Fed. R. Civ. P.. this 1st day of April, 2005.

/s/ Michael F. Aylward
